

1 DAVID B. LEVANT (*pro hac vice*)
2 david.levant@stoel.com
3 ANDREW H. MORTON (*pro hac vice*)
4 andrew.morton@stoel.com
5 JENNIFER L. MERSING (*pro hac vice*)
6 jennifer.mersing@stoel.com
7 JENNIFER N. SLOCUM (*pro hac vice*)
8 jennifer.slocum@stoel.com
9 STOEL RIVES LLP
10 600 University Street, Suite 3600
11 Seattle, WA 98101
12 Telephone: 206.624.0900
13 Facsimile: 206.386.7500

14 *Attorneys for the Ad Hoc Group of*
15 *Interconnection Customers*

16 SETH D. HILTON (SBN 181899)
17 seth.hilton@stoel.com
18 SARAH E. KOZAL (SBN 313043)
19 sarah.kozal@stoel.com
20 BAO M. VU (SBN 277970)
21 bao.vu@stoel.com
22 STOEL RIVES LLP
23 3 Embarcadero Center, Suite 1120
24 San Francisco, CA 94111
25 Telephone: 415.617.8900
26 Facsimile: 415.617.8907

27 **UNITED STATES BANKRUPTCY COURT**
28 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

1 **In re:**

2 **PG&E CORPORATION**

3 **- and -**

4 **PACIFIC GAS AND ELECTRIC**
5 **COMPANY,**

6 **Debtors.**

- 7 ☐ Affects PG&E Corporation
8 ☒ Affects Pacific Gas and Electric
9 Company
10 ☐ Affects both Debtors

11 **All papers shall be filed in the Lead Case,*
12 *No. 19-30088 (DM)*

13 Case No. 19-30088 (DM)
14 Chapter 11
15 (Lead Case)
16 (Jointly Administered)

17 **VERIFIED STATEMENT OF**
18 **STOEL RIVES LLP PURSUANT TO**
19 **FEDERAL RULE OF BANKRUPTCY**
20 **PROCEDURE 2019**

21 Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, the Ad Hoc Group of
22 Interconnection Customers of Pacific Gas and Electric Company (the “*Ad Hoc Group of*
23 *Interconnection Customers*”), by and through its undersigned counsel, hereby submit this verified
24 statement (this “*Statement*”), and in support thereof, state as follows:

1 1. In or around August 2019, the Ad Hoc Group of Interconnection Customers engaged
2 Stoel Rives LLP (“*Stoel Rives*”) to represent it in connection with certain Pass-Through Amounts
3 being withheld Pacific Gas and Electric Company (the “*Utility*”, and together with PG&E
4 Corporation, the “*Debtors*”).

5 2. As of the date of this Statement, Stoel Rives represents numerous other parties in
6 the Utility’s chapter 11 proceeding, in addition to the Ad Hoc Group of Interconnection Customers.
7 The members of the Ad Hoc Group of Interconnection Customers have each retained Stoel Rives
8 to represent them with respect to the administration and enforcement of their respective claims and
9 interests in connection with the Debtors’ chapter 11 cases. Each client has been informed of and
10 has consented to concurrent representation by Stoel Rives.

11 3. In accordance with Bankruptcy Rule 2019, a list of the names, addresses and the
12 “nature and amount of all disclosable economic interests” held in relation to the Debtors as of
13 October 22, 2019, by each member of the Ad Hoc Group of Interconnection Customers follows:

<u>Name & Address of Creditor</u>	<u>Nature of Claim</u>	<u>Claim Amount¹</u>
CA Flats 130, LLC 10 East 53 rd Street, 17 th Floor New York, NY 10022	Network Upgrade Reimbursements	To be determined ²
CA Flats 150, LLC 10 East 53 rd Street, 17 th Floor New York, NY 10022		
CA Flats 150, LLC 10 East 53 rd Street, 17 th Floor New York, NY 10022	Test Period Payment	\$274,159.67

1 The claim amounts for Network Upgrade Reimbursements are subject to interest at the regulated rate. The Network Upgrade Reimbursements are to be paid according to a schedule specific to each Interconnection Customer, with payments generally becoming due each financial quarter. Therefore, these amounts represent only a baseline amount that is currently owed as of the date of this filing, subject to amendment as more payments become due.

2 The Utility asserts that its obligations to begin making payments to these two members did not commence until after the Cal Flats 150 Project achieved commercial operation in March 2019, notwithstanding that the Cal Flats 130 Project had achieved commercial operation in November 2017. CA Flats 130, LLC believes it is entitled to \$7,800,000 of payments over a five year period that should have already begun following its project’s commercial operation date, plus interest in the amount of at least \$1,447,311.88. CA Flats 150, LLC believes it is entitled to \$9,000,000 of payments over a five year period from its project’s commercial operation date, plus interest in the amount of at least \$1,669,975.25.

<u>Name & Address of Creditor</u>	<u>Nature of Claim</u>	<u>Claim Amount¹</u>
Solar Star California XIII, LLC 10 East 53 rd Street, 17 th Floor New York, NY 10022	Network Upgrade Reimbursements	\$6,000,000.00
67RK 8me LLC c/o FTP Power LLC 2180 South 1300 East, Suite 600 Salt Lake City, Utah 84106	Network Upgrade Reimbursements	\$462,171.42
65HK 8me LLC c/o FTP Power LLC 2180 South 1300 East, Suite 600 Salt Lake City, Utah 84106		
87RL 8me LLC c/o FTP Power LLC 2180 South 1300 East, Suite 600 Salt Lake City, Utah 84106		
Adera Solar, LLC c/o FTP Power LLC 2180 South 1300 East, Suite 600 Salt Lake City, Utah 84106	Network Upgrade Reimbursements	\$219,150.00
RE Mustang LLC 200 West St., 3 rd Floor New York, NY 10282	Network Upgrade Reimbursements	\$3,514,185.93
RE Mustang 3 LLC 200 West St., 3 rd Floor New York, NY 10282		
RE Mustang 4 LLC 200 West St., 3 rd Floor New York, NY 10282		

4. As of the date hereof, Steel Rives does not hold a claim against any of the Debtors or any interest in any of the Debtors.

5. The information set forth in this Statement, which is based on information provided by the applicable members of the Ad Hoc Group of Interconnection Customers, is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose.

6. Stoel Rives reserves the right to revise and supplement this verified statement in accordance with the requirements set forth in Bankruptcy Rule 2019 to the extent required and will obtain additional consents as necessary.

7. Nothing contained in this Statement should be construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Group of Interconnection Customers to assert, file, or amend their claims in accordance with applicable law and any orders entered in these chapter 11 cases.

The undersigned verifies under oath that the foregoing statement is true and accurate, to the best of the undersigned's knowledge and belief.

DATED: October 22, 2019.

STOEL RIVES LLP

/s/ David B. Levant

David B. Levant (*pro hac vice*)
 Andrew H. Morton (*pro hac vice*)
 Jennifer L. Mersing (*pro hac vice*)
 Jennifer N. Slocum (*pro hac vice*)
 Stoel Rives LLP
 600 University Street, Suite 3600
 Seattle, WA 98101
 206.624.0900
david.levant@stoel.com

*Attorneys for Ad Hoc Group of
Interconnection Customers*